

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

UNITED STATES OF AMERICA,

Plaintiff,

v.

RICHARD PARHAM,

Defendant.

)  
)  
)  
) Criminal Action No. 07-217M  
)  
)

) [S.D.N.Y. Crim. Act. No. 96-CR-279]  
)  
)

**MOTION FOR DETENTION**

**NOW COMES** the United States and moves for the detention of the defendant, Richard Parham, pursuant to 18 U.S.C. §§ 3143(a) and 3583(e), and Federal Rules of Criminal Procedure 32.1(a)(6) and 46(d), pending a hearing on the violation of supervised release petition.

In support of the motion, the United States alleges that the defendant poses a danger to the community, a risk of non-appearance and cannot meet his burden of proving, by clear and convincing evidence, that he is not likely to pose a risk of flight or danger to the community if released. The United States further alleges that the defendant cannot demonstrate that he is able to abide by any condition or combination of conditions of release.

Respectfully submitted,

COLM F. CONNOLLY  
United States Attorney

BY:

Christopher J. Burke  
Christopher J. Burke  
Assistant United States Attorney

Dated: October 31, 2007

